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**LMOS Reply Affidavit – Attachment G**

Utilizing a similar methodology as in the Joint LMOS affidavit,<sup>1</sup> SWBT has updated its analysis of the impact of the possible “lag” between the posting of the D and C orders to LMOS on a CLEC’s ability to submit a UNE-P trouble ticket electronically.<sup>2</sup> As in the first analysis, this assumes that the embedded database in LMOS is accurate and up to date.<sup>3</sup> Instead of using CABS posting data, in this analysis SWBT utilized actual LMOS posting data for a sample of region-wide CLEC UNE-P orders (422) from July and August 2001. The table below reflects the sample data:

Table 1  
% LMOS Records Updated

	<b>July and August</b>
<b>Day 0</b>	62.56%
<b>Day 1</b>	19.43%
<b>Day 2</b>	10.19%
<b>Day 3</b>	3.08%
<b>Day 4</b>	3.08%
<b>Day 5</b>	0.00%
<b>&gt; 5</b>	1.66%

As shown in Table 1, above, 98.34% of LMOS records were updated within 5 days of completion in SORD, such that electronic trouble tickets could be opened. Therefore, it remains reasonable to assume that manual trouble tickets submitted on UNE-P lines because of a lag between the posting of the D and C orders to LMOS would only be submitted in the first 5 days following completion of the service orders in SORD.

Because PM 35 captures the percentage of POTS and UNE-P trouble reports within 10 days of installation, it captures all manual trouble reports within 5 days of installation. SWBT reviewed region-wide PM 35 data for the period from June through August 2001 for all CLECs to determine the distribution of I-10 reports, on a day-to-day basis, from the date of installation (Day 0) through the tenth day (Day 10) following order installation.<sup>4</sup> That analysis reflects the following:

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<sup>1</sup> See Attachment F of the SWBT Joint LMOS affidavit for the calculation methodology.

<sup>2</sup> This analysis also includes those trouble tickets that the CLEC chose to submit manually prior to the posting of the D order in LMOS.

<sup>3</sup> This assumption relies on the CABS /LMOS comparison process as well as the manual process implemented in the LOC as described in the joint affidavit.

<sup>4</sup> The trouble report data used in this analysis is region wide data drawn from the period June 2001 through August 2001.

Table 2  
Receipt of CLEC UNE-P Trouble Reports Within 10 Days of Installation (I-10)

Day 0	5.27%
Day 1	14.03%
Day 2	11.44%
Day 3	10.28%
Day 4	10.47%
Day 5	9.28%
Day 6	10.40%
Day 7	10.44%
Day 8	7.63%
Day 9	5.30%
Day 10	5.46%

Based on these assumptions, we can conclude that the “lag” will require manual submission of an extremely small percentage of all CLEC trouble tickets – only 1.1 percent.<sup>5</sup> Put another way, the lag will not require the submission of manual trouble tickets for 98.9% of the CLECs’ trouble tickets.

As in Attachment F, SWBT also analyzed the lag from the perspective of the impact on new UNE-P customers and existing UNE-P customers with new order activity, again using actual LMOS posting data, rather than CABS data. The installation report rate within 5 days (I-5) for the SWBT region from June through August is 1.14% — meaning that CLECs open trouble reports on 1.14% of UNE-P lines with order activity within the first five days after installation.<sup>6</sup> The table below reflects the percent of these I-5 trouble reports received by day for June through August 2001:

	<b>June – August</b>
<b>Day 0</b>	8.66%
<b>Day 1</b>	23.08%
<b>Day 2</b>	18.83%
<b>Day 3</b>	16.92%
<b>Day 4</b>	17.23%
<b>Day 5</b>	15.27%

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<sup>5</sup> This is the same calculation as in footnotes 6-8 of Attachment F to the LMOS Affidavit and the accompanying text, except that it was assumed that trouble tickets could be opened on Day 1 in proportion to the percentage of line records updated in LMOS in the sample.

<sup>6</sup> Due to a minor calculation error, SWBT previously represented this figure as 1.11 percent. See Ex parte Letter from Geoffrey M. Klineberg to Magalie Roman Salas, FCC, Attach. G (FCC filed Oct. 1, 2001).

During this period SWBT received 572,018 UNE-P orders for new service, conversions and additional services to existing customers.<sup>7</sup> We can assume that a CLEC can open an electronic ticket on all orders on the completion date (Day 0) since the D order will not post until that evening. Therefore, the percent of I-5 reports for Day 0 through Day 5 estimated to be required to be submitted manually is 14.43% or 15.79% of those submitted within Day 1 through Day 5.<sup>8</sup>

Since only 1.14% of all UNE-P orders had a trouble ticket within 5 days then it follows that 98.86% of all UNE-P customers with order activity (572,018) could not be impacted by any potential lag. In addition, of the 6516 trouble tickets submitted within the first five days after installation, an estimated 85.57% could have been submitted electronically (5576). Therefore, at least 99.84% of the UNE-P customers are unaffected by the lag and the inability of CLECs to open trouble tickets electronically during that lag.

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<sup>7</sup> For the purposes of this analysis it is assumed that one order equates to one customer.

<sup>8</sup> This is the same calculation as in footnotes 14-15 of Attachment F to the LMOS Affidavit and the accompanying text, except that it was assumed that trouble tickets could be opened on Day 1 in proportion to the percentage of line records updated in LMOS in the sample.



H



## **LMOS Reply Affidavit – Attachment H**

**AT&T / TCG Trouble Report Performance Data  
SWBT Five-State Region — June–August 2001**

PM 35			
	Total Orders	Trouble Reports	% I-10 Reports
Jun-01			1.63%
Jul-01			1.63%
Aug-01			1.64%
Total			1.63%

PM 37			
	Total Lines	Trouble Reports	Report Rate
Jun-01			2.97%
Jul-01			2.44%
Aug-01			2.35%
Total			2.59%

PM 35 – I-10 Reports by Day	
	Cumul. Percent
Day 0	4.42%
Day 1	14.98%
Day 2	24.08%
Day 3	33.58%
Day 4	43.09%
Day 5	51.99%
Day 6	63.85%
Day 7	77.38%
Day 8	86.63%
Day 9	93.51%
Day 10	100.00%





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**LMOS Reply Affidavit – Attachment I**



J

**LMOS Reply Affidavit – Attachment J**

**PM 17.1 – Service Order Posting - CABS**

	<b>Feb-01</b>	<b>Mar-01</b>	<b>Apr-01</b>	<b>May-01</b>	<b>Jun-01</b>	<b>Jul-01</b>	<b>Aug-01</b>
<b>Day 1</b>	73,725	126,933	127,020	124,651	59,337	103,099	140859
<b>Day 2</b>	44,982	49,492	31,612	57,631	101,599	69,086	72046
<b>Day 3</b>	20,074	13,324	12,013	13,984	43,310	24141	21999
<b>Day 4</b>	10,881	7,390	10,131	7,269	12,799	11634	11680
<b>Day 5</b>	3,940	5,778	6,159	1,001	3,032	8688	6538
<b>&gt;5</b>	3,349	1,847	1,804	1,847	1,409	1822	1214
<b>Total</b>	156,951	204,764	188,739	206,383	221,486	218,470	254,336

	<b>Feb-01</b>	<b>Mar-01</b>	<b>Apr-01</b>	<b>May-01</b>	<b>Jun-01</b>	<b>Jul-01</b>	<b>Aug-01</b>
<b>Day 1</b>	46.97%	61.99%	67.30%	60.40%	26.79%	47.19%	55.38%
<b>Day 2</b>	28.66%	24.17%	16.75%	27.92%	45.87%	31.62%	28.33%
<b>Day 3</b>	12.79%	6.51%	6.36%	6.78%	19.55%	11.05%	8.65%
<b>Day 4</b>	6.93%	3.61%	5.37%	3.52%	5.78%	5.33%	4.59%
<b>Day 5</b>	2.51%	2.82%	3.26%	0.49%	1.37%	3.98%	2.57%
<b>&gt;5</b>	2.13%	0.90%	0.96%	0.89%	0.64%	0.83%	0.48%

K

**LMOS Reply Affidavit – Attachment K**



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L

**LMOS Reply Affidavit – Attachment L**

**Question No. 3**

Please provide more information concerning the "CABS D" service order errors referenced at ¶ 22 of the LMOS Affidavit. Were these isolated incidents? How did you determine the errors had occurred? Did this impact the CLEC's ability to open electronic trouble tickets on UNE-P lines? If so, were they included in the "% Updated" calculations for LMOS Affidavit Attachments C through E? If not, why not?

**Response**

1. CLEC UNE-P accounts are established in SWBT's CABS billing system. For billing purposes, multiple CLEC UNE-P lines are grouped under a single Billing Account Number (BAN).<sup>1</sup>
2. Disconnection of individual UNE-P lines in the CABS database is accomplished through use of a C service order, while disconnection of a CABS BAN is accomplished through use of a CABS D service order. Accordingly, a CABS D order that is issued incorrectly to disconnect an individual UNE-P line should hit CABS edits and fall out for manual correction before posting.
3. Between the June 6 and July 19 LMOS/CABS database comparisons, SWBT's LSC processed four separate CLEC requests for the disconnection of a four separate UNE-P telephone numbers. Rather than issuing C service orders for disconnection of the lines in question, three different LSC representatives erroneously issued CABS D orders.
4. As a result of a system change effective March 29, 2001,<sup>2</sup> LMOS processes D service orders after SORD completion, before they have passed through edits in the billing systems. Accordingly, when the CABS D orders in question posted to LMOS, all UNE-P line records associated with the CABS BANs in question were disconnected. Specifically:
  - Service orders \*\*\* both completed on June 22, 2001, resulting in the disconnection of the LMOS UNE-P records associated with Birch CABS BAN \*\*\* of these records were updated in the July 19 CABS/LMOS database comparison.
  - Service order \*\*\* completed June 25, 2001, resulting in the disconnection of the LMOS UNE-P line records associated with AT&T \*\*\* of these records were updated in the July 19, 2001 LMOS/CABS database comparison.
  - Service order \*\*\* completed July 17, 2001, resulting in the disconnection of the LMOS UNE-P line records for Choctaw Communications (Smoke Signals

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<sup>1</sup> BANs for CLEC accounts are set up on a per LATA and per product basis, and can accommodate the billing of up to 99,999 individual UNE-P lines. Once this maximum number of UNE-P lines has been reached, another BAN must be established for billing of additional lines.

<sup>2</sup> See, LMOS Affidavit ¶ 16

Communications) \*\*\*

in the July 19, 2001 LMOS/CABS database comparison.

\*\*\* of these records were updated

5. Although the LMOS records for these lines were disconnected, dialtone service to the end users was not adversely impacted. Only the UNE-P lines requested by the CLEC were actually disconnected by the orders in question.
6. On July 3, 2001, the LOC received calls from both AT&T and Birch advising that they were unable to open a trouble report electronically on certain telephone numbers. Upon investigation, SWBT discovered that issuance of the CABS D orders referenced above had lead to disconnection of the LMOS line records associated with the CABS BANS in question. Effective July 19, 2001, the logic for the LMOS nightly update cycle was revised to prevent LMOS from processing CABS D orders on UNE-P lines immediately after completion. Because CABS D orders now are updated in LMOS from the BJ501 file, after passing edits and posting to CABS, such disconnections should not occur in the future.
7. Effective July 19, 2001, SWBT's LSC service representatives were retrained concerning proper issuance of CABS D orders. While SWBT cannot guarantee that similar service order errors will not occur in the future, in the event such errors do occur, the programming change referenced in the previous paragraph will act to prevent improper disconnection of LMOS records.
8. Based on SWBT's investigation, it appears that no erroneous CABS D orders, other than those referenced above, were issued between March 29 and July 19, 2001. Prior to March 29, 2001, during the time in which D orders posted to LMOS after posting to the billing systems, an erroneously issued CABS D order should have been caught by CABS edits and manually corrected, as described above, thus preventing the posting of these orders to LMOS.
9. SWBT covered these issues with Birch and AT&T, on conference calls held on July 25 and August 15, respectively.
10. Because disconnection of the LMOS records in question was the result of manual error in service order creation, and protection against such errors in the future was quickly implemented, SWBT did not include those numbers in the "Total LMOS Records Placed in Working Status/Updated" category for the July 19 LMOS/CABS database comparison. In SWBT's LMOS Affidavit, the total number of LMOS records disconnected as a result of the CABS D orders in question appears at footnote 12. A footnote to LMOS Affidavit Attachment D stating "The San Antonio figures are adjusted to exclude 25,814 LMOS line records that were updated in this process, but were disconnected as a result of erroneous CABS D orders issued on three CABS BANS" was inadvertently omitted from the original filing. The correct version of Attachment D was provided with SBC's ex parte letter dated September 25, 2001.